

1 **STED**

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10 *Attorneys for Plaintiffs*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 JACLYN SICILIA,

14 Plaintiff,

15 vs.

16 STATE FARM MUTUAL AUTOMOBILE
17 INSURANCE COMPANY; DOES 1 through 10;
18 and ROE ENTITIES 11 through 20, inclusive,

19 Defendants.

CASE NO.:2:14-cv-000812-GMN-GWF

20 **STIPULATION AND ORDER FOR EXTENSION OF TIME**
21 **TO COMPLETE DISCOVERY (THIRD REQUEST)**

22 IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, by
23 and through their respective counsel that the discovery deadlines shall be extended in this
24 matter.

25 **I. DISCOVERY COMPLETED TO DATE**

26 The parties have participated in the following discovery to date:

- 27 1. Exchanged witness lists and produced documents and supplements thereto pursuant to
28 FRCP 26;

2. Written discovery propounded upon Plaintiff;
3. Written discovery propounded upon Defendant;
4. Experts disclosed;

II. DISCOVERY REMAINING

Further discovery is needed to depose the parties and necessary witnesses.

III. REASONS WHY DISCOVERY NOT COMPLETED WITHIN TIME SET BY DISCOVERY PLAN

Although the parties have engaged in discovery, there is still extensive discovery remaining in this case, depositions need to be taken. The parties have acted in good faith in this matter in terms of complying with discovery deadlines, but require additional time for discovery for the reasons stated above. Parties have not purposefully procrastinated or caused undue delay, and this is the third request for an extension of discovery. The parties request a ninety (90) day extension of the current discovery cut-off of September 11, 2015.

IV. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY

Based on the foregoing, the proposed schedule for completing discovery is as follows:

Initial Expert Disclosures: No change

Current Date:	February 16, 2015
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Rebuttal Expert Disclosures: No change

Current Date:	March 18, 2015
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Discovery Cut-Off

Current Date:	June 16, 2015
Extended Date:	September 11, 2015

Dispositive Motions

Current Date:	July 15, 2015
Extended Date:	October 11, 2015

Pre-Trial Order

Current Date: August 14, 2015
Extended Date: November 11, 2015

V. TRIAL DATE

Trial of this matter is not currently set. This is the first request to extend discovery. This request will extend discovery for ninety (90) days, with specific emphasis on extending the discovery cut-off date.

Wherefore, the parties respectfully request that the Court grant this request to extend the discovery deadlines as outlined above and to set the trial date accordingly, if necessary.

DATED this 15th day of June, 2015
RICHARD HARRIS LAW FIRM

/s/ Kyle A. Stucki, Esq.

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DATED this 15th day of June, 2015
DENNETT WINSPEAR, LLP

/s/ Brent D. Quist, Esq.

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ORDER FOR EXTENSION OF TIME TO COMPLETE DISCOVERY

IT IS HEREBY ORDERED ADJUDGED AND DECREED that the parties' request for extension of time to complete discovery is hereby GRANTED.

DATED this 17th day of June, 2015.



GEORGE FOLEY, JR.
United States Magistrate Judge

Submitted by:
RICHARD HARRIS LAW FIRM

DATED this 15th day of June, 2015

/s/ Kyle A. Stucki, Esq.

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